

February 24, 2011

Mr. Christopher Whyrick Senior Campaign Finance Analyst Federal Election Commission Washington, D.C. 20464

RE: C00243428

Dear Mr. Whyrick:

This letter serves as explanation to the three requests for additional information we recently received. I want to clarify the amendments our committee has made.

- 1. The two possible excessive contributions on the October quarterly report. The Essig?s contribution on 5/1/09 should have been attributed to his spouse, Erin, as her name was circled on the check. The contribution from Mr. Essig on 8/30/201 and the contribution from Mr. McGrath on 7/8/2010 were to be designated for the general election. Both of those contributions were made via credit card online. This was our first full cycle taking credit card contributions and I was unaware that the software used to take those contributions had to be updated manually after each election. I had assumed the cycle would automatically update after the election date, like our campaign software does. I spoke to our vendor and we received additional training so that problem will not occur again in the future.
- 2. The possible excessive contribution on the 30 day Post General report. The Electrical Construction PAC?s contribution of \$3,500 dated 6/18/10 should have been dated 6/7/10 as the post mark on the envelope is that date. I have amended the report to reflect the correct date.
- 3. The credit contribution cycle update issue also caused many contributions that were dated after the primary to appear to be designated for the primary. Any contribution dated after June 7, 2010 should have been designated for the general election. Again I have worked with our vendor to correct all those incorrect entries and amended the report.
- 4. I was able to find some of the FEC registration numbers for the following: FED BID AIR PAC, PHI-PECO-CONECTIV PAC, and ADPAC and added those numbers to the amended reports. We do take steps to help ensure we only take permissible funds from non-registered PACs. We usually have an organization include a letter with their contribution stating that the contribution is only from federally permissible funds. However we due rely on the good faith of each organization disclosing this information. I am going to follow your suggestion in periodically checking questionable committee election reports filed with other reporting agencies.
- 5. The credit card itemization was also amended. Again, the software we use did not pull any itemizations that were not within the election cycle. However on our end it looked like it did. I have worked with our vendor and developed a system to ensure this does not happen again.
- 6. The Cycle to Date discrepencies-I have combined the records where needed and will run periodic reports on our end to look for duplicates and combine them.
- 7. Regarding ?best efforts?, I recognize the importance of obtaining employer information. Aside from the letters and emails we send requesting the information, I am going to start utilizing the more popular social networking sites like Linked in and Facebook to assist us in obtaining this information.
- 8. Finally, the line 17 Column B discrepancy of \$72.93 was from a credit card itemization that was mis-coded. I